

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

TONY M. SAIN, SB# 251626

E-Mail: Tony.Sain@lewisbrisbois.com

TORI L. N. BAKKEN, SB# 329069

E-Mail: Tori.Bakken@lewisbrisbois.com

ABIGAIL J. R. McLAUGHLIN, SB# 313208

E-Mail: Abigail.McLaughlin@lewisbrisbois.com

633 West 5<sup>th</sup> Street, Suite 4000

Los Angeles, California 90071

Telephone: 213.250.1800

Facsimile: 213.250.7900

Attorneys for Defendants, CITY OF  
LOMPOC and ALEXANDER JUSTICE

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JEFFREY AMADOR, VERONICA  
BENNETT, individually and as  
successors-in-interest to Connor  
Amador, deceased,

Plaintiffs,

vs.

CITY OF LOMPOC; ALEXANDER  
JUSTICE; DOES 1-10, inclusive,

Defendants.

Case No. 2:25-cv-00167-FMO-SSC  
[Hon. Fernando M. Olguin, Dist. Judge;  
Hon. Stephanie S. Christensen, M.  
Judge]

**STIPULATION TO DISMISS  
ENTIRE CASE WITH PREJUDICE**

Complaint Filed: January 7, 2025  
Trial Date: May 26, 2026

In accordance with Federal Rule of Civil Procedure 41, Plaintiffs JEFFREY AMADOR and VERONICA BENNETT (“Plaintiffs”) and Defendants CITY OF LOMPOC and Officer ALEXANDER JUSTICE (collectively “Defendants”) hereby stipulate for the purpose of jointly requesting that the honorable Court dismiss with prejudice the above-captioned matter.

**GOOD CAUSE STATEMENT**

1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), a plaintiff may dismiss an action without a court order by filing a stipulation of dismissal signed by all parties who have appeared.

2. On January 7, 2025, Plaintiffs filed a Complaint against Defendants and DOES 1-10 in the above-entitled action, alleging damages as a result of an officer involved shooting (“OIS”) incident that occurred on December 29, 2023 involving the City of Lompoc Police Department and Connor Amador (the “Action”). [Dkt. 1.]

3. Defendants denied and continue to deny all allegations made by Plaintiffs, including, but not limited to: Plaintiffs’ first cause of action for Violation of the Fourth Amendment – Detention and Arrest; second cause of action for Violation of the Fourth Amendment – Excessive Force; third cause of action for Violation of the Fourth Amendment – Denial of Medical Care; fourth cause of action for Violation of the Fourteenth Amendment – Substantive Due Process; fifth cause of action for Battery (Survival and Wrongful Death) under California Law; sixth cause of action for Negligence (Survival and Wrongful Death) under California Law; and seventh cause of action for Violation of the Bane Act (California Civil Code § 52.1) (the “Claims”), and that Defendants are liable for any of Plaintiffs’ damages.

4. The parties hereby stipulate that there is Good Cause for Dismissal With Prejudice of Plaintiffs’ Action against Defendants and DOES 1-10 in their entirety as stated herein below:

5. Plaintiffs agreed to accept the total aggregate sum of \$0.00 (zero) dollars and mutual waiver of costs as between Plaintiffs and Defendants in full settlement and compromise of their Claims and the Action and agree that such consideration shall fully and forever discharge and release all rights, demands, claims and causes of action, whether known or unknown, which Plaintiffs have against Defendants including, but not by way of limitation, the Claims, the operative Complaint, and any claims which could have been presented in the Action.

6. Plaintiffs’ counsel, by signing this Stipulation, attests that Plaintiffs’ counsel has consulted with Plaintiffs and Plaintiffs have authorized the release of all Claims associated with the December 29, 2024 OIS involving Connor Amador. Accordingly, through their counsel, plaintiffs to this action have agreed to be bound

1 by this release and to forever discharge, release, and dismiss with prejudice any and  
2 all of their claims in the action and to dismiss with prejudice any and all defendants  
3 to such action, as well as any and all claims against such defendants' agents.

4 7. This Stipulation resolves disputed claims. Defendants disputed, and  
5 continue to dispute. the Claims and all of Plaintiffs' allegations. This Stipulation does  
6 not and shall not constitute an admission of wrongdoing, fault, or liability on the part  
7 of Defendants.

8 8. In light of the foregoing, the parties hereby stipulate that there is Good  
9 Cause to dismiss with prejudice the entirety of the pending matter.

10 **STIPULATION FOR DISMISSAL**

11 9. Therefore, in light of all of the foregoing, the parties hereby stipulate to,  
12 and respectfully request that the Court issue an appropriate Order giving effect to the  
13 dismissal **with prejudice** of Plaintiffs JEFFREY AMADOR and VERONICA  
14 BENNETT's lawsuit in its entirety.

15 10. It is further stipulated, by the parties, that this dismissal constitutes a  
16 mutual waiver of all costs, court fees, and attorneys' fees arising out of claims  
17 between Plaintiffs JEFFREY AMADOR and VERONICA BENNETT and  
18 Defendants CITY OF LOMPOC and Officer ALEXANDER JUSTICE, as well as any  
19 unnamed DOE Defendants referenced in Plaintiff's Complaint.

20 **IT IS SO STIPULATED**

21  
22 DATED: July 15, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

23 By: /s/ *Tori L.N. Bakken*

24 TONY M. SAIN

25 TORI L.N. BAKKEN

26 ABIGAIL J.R. McLAUGHLIN

27 Attorneys for Defendants,

28 CITY OF LOMPOC and ALEXANDER  
JUSTICE

1 DATED: July 14, 2025

LAW OFFICES OF DALE K. GALIPO

2 By: /s/ *Hang D. Le*

3 DALE K. GALIPO

4 HANG D. LE

5 Attorneys for Plaintiffs,

6 JEFFREY AMADOR and VERONICA  
7 BENNETT

**FEDERAL COURT PROOF OF SERVICE**

Jeffrey Amador, et al v. City of Lompoc, et al.

Case No. 2:25-cv-00167-FMO-SSC

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On July 15, 2025, I served the following document(s): **STIPULATION TO DISMISS ENTIRE CASE WITH PREJUDICE**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Law Offices of Dale K. Galipo  
Dale K. Galipo (Bar No. 144074)  
Hang D. Le (Bar No. 293450)

Santiago G. Laurel  
[dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)

[hlee@galipolaw.com](mailto:hlee@galipolaw.com)  
[slaurel@galipolaw.com](mailto:slaurel@galipolaw.com)

21800 Burbank Blvd., Suite 310  
Woodland Hills, CA 91367  
T: (818) 347-3333

**ATTORNEY FOR PLAINTIFFS**

The documents were served by the following means:

☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on July 15, 2025, at Los Angeles, California.

*/s/ Curfew F. Wilson*

Curfew F. Wilson